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REMARKS

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With this response, claims 1, 5 and 9 are amended. No new matter is added.

Applicant respectfully traverses the rejection of claims 1-20, as being anticipated by Croome et al., US Patent App. 20040014423 ("Croome"), at page 2 paragraph 2 of the Office Action.

Claim 1 as currently amended, recites a security function that associates the private content stored in the terminal memory with the first IMSI or first MSISDN/IMSI combination of at least one authorized smart card to grant access to the private content only to the at least one authorized smart card. The Office Action states that Croome discloses this element. (page 2, paragraph 2 of Office Action) However, Croome (paragraph 006) fails to disclose or suggest this element. Instead, Croome discloses accessing a GSM network through a user entering a PIN for comparison by a SIM with the stored PIN number on the SIM. (See Croome, p. 1, paragraph 0006.) In Croome, the SIM identifies the mobile phone user, not the terminal. (See Croome, p. 1, paragraph 0006.) In Croome, the PIN is a security code that is identified with the SIM, and enables access to the GSM network when the PIN entered by a user matches the PIN stored within the SIM. (See Croome, p. 1, paragraph 0006.) The PIN, as disclosed in Croome, bears no relationship to an International Mobile Subscriber Identity (IMSI) associated with the private contents stored in the terminal memory of the mobile terminal, as recited in claim 1. Croome fails to disclose or suggest access to private content stored in a terminal memory. According to Croome, the user may gain access to the GSM network by entering a PIN that matches the PIN of the SIM. The PIN of Croome is never compared with the IMSI or MSISDN/IMSI combination associated with private content stored in the terminal memory. Therefore, Croome does not disclose or suggest at least one of the elements of independent claim 1. Accordingly, independent claim 1 is allowable over Croome.

Claims 2-8 depend from allowable independent claim 1, and therefore dependent claims 2-8 are also allowable over Croome at least by virtue of their dependency from allowable claim 1.

Claim 9 recites a method of controlling access to private content stored in a GSM/SIM mobile terminal, comprising providing the private content with private content IMSI/MSISDN information. The Office Action states that Croome discloses this feature. (Page 4, 2nd paragraph of Office Action). However, Croome fails to disclose or suggest this element. Instead, Croome discloses a SIM holding a variety of information including an IMSI, a copy of the user PIN code, and a user phone book. (See Croome, page 1, paragraph 0005.) In Croome, private content such as a user phone book stored in a SIM, is not provided with IMSI/MSISDN information, but rather is simply stored on the SIM, which SIM also contains IMSI/MSISDN information. (See Croome, page 1, paragraph 0005.) Therefore, Croome does not disclose or suggest providing the private content with private content IMSI/MSISDN information, as recited in claim 9.

Claim 9 further recites associating the private content IMSI/MSISDN information with at least one SIM from a plurality of SIMs, each SIM of the plurality of SIMs including respective IMSI/MSISDN information. The Office Action states that Croome (paragraph 0005) teaches associating the private content IMSI/MSISDN with the IMSI/MSISDN of a SIM. See Office Action, page 4, 2nd paragraph: "...Croome teaches the SIM holds a variety of information including the international Mobile Subscriber Identity (IMSI), which uniquely identifies the subscriber, ...a user phone book same as group of contact information...." However, in Croome, the private content resides in the SIM, but not in the GSM/SIM mobile terminal. In Croome, the IMSI/MSISDN simply resides on the same SIM as the private content. (See Croome, page 1, paragraph 0005.) Thus, Croome fails to disclose or suggest associating the private content IMSI/MSISDN information with at least one SIM from a plurality of SIMs. Therefore, Croome does not disclose at least this element of claim 9.

Claim 9 further recites comparing the private content IMSI/MSISDN information with the IMSI/MSISDN information of a SIM and comparing the private content IMSI/MSISDN information with the IMSI/MSISDN information of a SIM. The Office Action states that Croome paragraph 0006 discloses comparing the IMSI/MSISDN of the private content with the IMSI/MSISDN of the SIM. (See Office Action, p. 4, 5th paragraph.) However, in Croome, the IMSI/MSISDN resides on the SIM, but is not compared with an IMSI/MSISDN associated with private content; instead, in Croome, the user must enter their PIN for comparison by the SIM with the stored PIN value. (See Croome, p. 1, paragraph 0006.) Croome fails to disclose or

suggest comparing private content IMSI/MSISDN with the IMSI/MSISDN of the SIM, as recited in claim 9.

Accordingly, for at least the reasons presented above, independent claim 9 is allowable over Croome. Claims 10-14 depend from allowable claim 9. Therefore claims 10-14 are also allowable over Croome, at least by virtue of their dependency from allowable claim 9.

Claim 15 recites a system comprising mobile equipment that accesses a wireless network by radio transmission and reception using 3GPP protocols, wherein the mobile equipment comprises private content stored on the internal memory of the mobile equipment, and further wherein the private content, or a pre-determined portion thereof, is associated with IMSI and MSISDN information unique to an owner of the private content or the pre-defined portion of the private content. The Office Action has rejected independent claim 15 as being anticipated by Croome. (See Office Action, pp. 4-6.) However, Croome fails to disclose or suggest that private content stored on the internal memory of mobile equipment, or a pre-determined portion thereof, is associated with IMSI and MSISDN information unique to an owner of the private content or the pre-defined portion of the private content. Rather, Croome discloses a SIM containing an IMSI, a PIN code, a user phone book, and other data. (See Croome, p. 1, paragraph 0005.) In Croome, the private content (such as a user phone book) is stored on the SIM, but not on the internal memory of the mobile equipment, as recited in claim 15. (See Croome, p. 1, paragraph 0005.) Further, the private content (such as a user phone book) of Croome is not associated with IMSI and MSISDN information. Rather, the private content of Croome simply resides on the SIM and IMSI information may also reside on the same SIM. (See Croome, p. 1, paragraph 0005.) Croome thus fails to disclose or suggest a system comprising mobile equipment that accesses a wireless network by radio transmission and reception using 3GPP protocols, wherein the mobile equipment comprises private content stored on the internal memory of the mobile equipment, and further wherein the private content, or a pre-determined portion thereof, is associated with IMSI and MSISDN information unique to an owner of the private content or a pre-determined portion thereof, as recited in claim 15.

Further, claim 15 recites wherein access to all or a pre-defined portion of private content occurs only when the IMSI/MSISDN information of the SIM correlates to the IMSI/MSISDN of

the private content, stored in the memory of the mobile equipment. In contrast to claim 15, the private content of Croome is stored on the SIM, and not in the mobile equipment. (See Croome p. 1 paragraph 0005.) Further, in Croome there is no correlation of IMSI/MSISDN information of the private content with IMSI/MSISDN of the SIM. Instead, in Croome there is a comparison of a user-entered PIN with the PIN of the SIM. (See Croome, page 1, paragraph 0006.)

Therefore Croome does not disclose or suggest that access to all or a pre-defined portion of private content occurs only when the IMSI/MSISDN information of the SIM correlates to the IMSI/MSISDN of the private content stored in the memory of the mobile equipment, as recited in claim 15.

Accordingly, for at least the reasons presented above, independent claim 15 is allowable over Croome. Claims 16-20 depend from allowable claim 15, and therefore claims 16-20 are allowable over Croome, at least by their dependency from allowable claim 15.

CONCLUSION

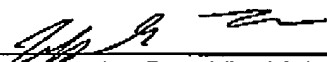
Applicant has pointed out specific features of the claims not disclosed by the reference applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the rejections, as well as an indication of the allowability of each of the pending claims.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date


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